

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA,
Plaintiff**

v.

**DAVID OLIVERAS-VILLANUEVA,
Defendant.**

Criminal No. 17-013 (FAB)

UNITED STATES' PROPOSED VOIR DIRE QUESTIONS

COMES NOW the United States of America, by and through the undersigned Assistant United States Attorney, and very respectfully submits the following proposed *voir dire* questions:

1. Does anyone have any personal knowledge about the facts of this case?
2. Have you, a family member, or close friend ever been the victim of or witness to a crime? If yes, please explain the kind of crime involved and your relation to the person involved as a victim or witness. Has this experience left you with a negative, positive, or neutral impression of law enforcement, judges, the judicial system, prosecutors, defense attorneys, or the criminal justice system?
3. Have you, a family member, or close friend ever been investigated for, arrested for, charged with, or convicted of any offense other than a minor traffic offense. If yes, please indicate:
 - a. The nature of the offense for which you were arrested or charged;
 - b. The disposition of the charge (i.e., dismissal of the charges, imprisonment, probation, find, etc.); and
 - c. Whether this experience has left you with a negative, positive, or neutral impression of law enforcement, judges, the judicial system, prosecutors, defense attorneys, or the criminal justice system.
4. Have you, a family member, of a close friend ever been interviewed by a law enforcement officer, including but not limited to a special agent of the F.B.I.? If yes, please indicate:

- a. The nature of the interview; and
 - b. Whether this experience has left you with a negative, positive, or neutral impression of law enforcement officers or the criminal justice system.
5. Do you have any opinions or feelings about the criminal justice system, such as judges, prosecutors, defense lawyers, and law enforcement officials, which would make it difficult for you to be fair and impartial jurors in this case?
6. Do you have any negative opinions about interviews conducted by law enforcement officers even when those interviews were entirely legal and proper?
7. Does the fact that this case involves the charge of making a false statement to a federal agent affect your ability to be fair to both sides in this case?
8. Do you know of any reason why you may be prejudiced for or against the government, for or against any witness, or for or against the defendant, because of the nature of the charges or otherwise?
9. Do you know any individuals that have worked for or with any armored transport service, including but not limited to Ranger American of Puerto Rico, Inc. (a/k/a Ranger American). If yes, please explain the nature of the relationship, the involvement with the armored transport service, and whether you have a negative, positive, or neutral impression of armored transport services and their employees.
10. Are you, a member of your family, or close friend a lawyer? If yes, please indicate whether your relationship with that individual left you with a negative, positive or neutral impression of judges, the judicial system, prosecutors, defense attorneys, or lawyers generally.
11. Does anyone suffer from any medical condition or impairment, including eyesight or hearing difficulties, which would prevent you from hearing the testimony and devoting your full attention to the presentation of the case?

12. Are you, or do you anticipate, taking any medication that could affect your ability to concentrate in any way?

WHEREFORE, the United States respectfully requests that this Honorable Court note the above and utilize the proposed *voir dire* questions herein as a part of the examination of potential jurors for trial.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 26th day of July, 2017.

CERTIFICATE OF SERVICE:

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all CM/ECF participants.

ROSA EMILIA RODRIGUEZ-VELEZ
United States Attorney

s/Seth A. Erbe

SETH A. ERBE

Assistant United States Attorney
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